

State Water Resources Control Board

January 27, 2016

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7015 1520 0001 8019 5326

Mr. Collins Kalu
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza
Los Angeles, California 9002
kaluc@metro.net

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT METRO DIVISION 2, 720 EAST 15TH STREET, LOS ANGELES**

Dear Mr. Kalu:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on January 13, 2016, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and title 23, California Code of Regulations (CCR), chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Operating Permit – The facility permit to operate is expired.	All	October 1, 2015	Ongoing	H&SC 25284(a)
2	Failure to Maintain Facility and Tank Information (A&B Forms) – Tank forms indicates overfill prevention as a fill tube shut-off valve, however, no valve was observed during the inspection.	T5, T10, T11	January 13, 2016	Ongoing	23 CCR 2711(a)(6)
3	Failure to Maintain Plot Plan/Site Map – Monitoring site plans do not include the location of the piping or monitoring equipment.	All	January 13, 2016	Ongoing	23 CCR 2711(a)(8)
4	Failure to Tag Monitoring Equipment – The line leak detector was not tagged.	T4	January 13, 2016	Ongoing	23 CCR 2641(j)

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, Ca 95812-0100 | www.waterboards.ca.gov

No.	Violation	Tank	Start Date	Stop Date	Regulation
5	Failure to Monitor Product Piping – The sensors in the piping sumps were unable to detect a leak at the earliest opportunity because they were placed between two existing tank collars.	T7, T11	January 13, 2016	Ongoing	23 CCR 2630(d)
6	Failure to Install Line Leak Detectors – Pneumatic pumps have pressurized underground piping without line leak detectors.	T6, T7, T8	January 13, 2016	Ongoing	23 CCR 2636(f)(2)
7	Failure to Maintain Secondary Containment – The failed components listed on the secondary containment test have not been repaired or retested.	T4, T6, T7, T8, T10	February 10, 2015	Ongoing	H&SC 25291(a)(2)
8	Failure to Maintain Secondary Containment – The failed components listed on the secondary containment test have not been repaired or successfully retested.	T5, T11, T15	October 29, 2010	Ongoing	H&SC 25291(a)(2)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and the Los Angeles City Fire Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Mr. Thomas Henderson
UST Enforcement Officer
Office of Enforcement
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, California 95814
tom.henderson@waterboards.ca.gov

Local CUPA

Mr. Bernard Sanchez
Fire Inspector
Los Angeles City Fire Department
200 Main Street, Suite 1700
Los Angeles, California 90012
bernard.sanchez@lacity.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Amantha Henkel', with a stylized flourish at the end.

Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Captain Daniel Dragotto
Los Angeles City Fire Department
daniel.dragotto@lacity.org

Mr. Bernard Sanchez
Fire Inspector
Los Angeles City Fire Department
bernard.sanchez@lacity.org

Mr. James Jimenez
Environmental Compliance & Services Manager
Los Angeles County Metropolitan
Transportation Authority
jjimenezja@metro.net

Mr. Roger Uhden
Sr. Environmental Specialist & Quality Assurance
Los Angeles County Metropolitan
Transportation Authority
uhdenr@metro.net